

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:  
MARITIME COMMUNICATIONS/  
LAND MOBILE, LLC**

**CHAPTER 11  
CASE NO. 11-13463-JDW**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF NECESSARY EXPENSES  
FOR SPECIAL COUNSEL ROBERT J. KELLER, P.C.**

COMES NOW Maritime Communications/Land Mobile, LLC (the "Debtor"), and files this its Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Special Counsel Robert J. Keller, P.C. (the "Application"), and in support thereof, would show as follows, to-wit:

1. On August 1, 2011, the Debtor filed its Voluntary Petition for reorganization with this Court under Chapter 11 of the Bankruptcy Code.

2. On December 21, 2011, an Order was entered by the Court, *nunc pro tunc* to August 1, 2011, approving the employment of Robert L. Keller, P.C. ("Mr. Keller") of Post Office Box 33428, Washington, DC 20033-0428, to act as the Debtor's special counsel in connection with any regulatory issues and efforts involving the FCC licenses in which the Debtor may have an interest and in any ensuing litigation related thereto.

3. This is the Debtor's second request for allowance of compensation for professional services rendered in this proceeding by Mr. Keller. This request covers the period from November 21, 2012, to and including January 11, 2013, and is for the sum of \$17,010.00 in fees. Mr. Keller's invoice of January 11, 2013, in that amount is attached hereto as Exhibit "A" and incorporated herein by reference.

4. The first request covered the period from August 1, 2011, to and including November 20, 2012, and was for the sum of \$249,043.44, which represented \$248,045.00 in fees and \$7,205.00 in expenses, less \$6,207.46 retainer being held by Mr. Keller. An Order approving the full amount of the first request was entered by the Court on January 14, 2013.

5. The services rendered to the Debtor by Mr. Keller have been of benefit to the estate, they are fair and reasonable and should be approved.

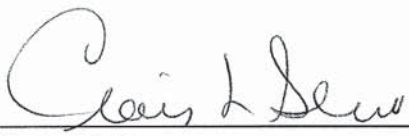
WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court enter an appropriate Order awarding reasonable attorneys' fees for the professional services rendered by Mr. Keller and authorizing and directing the Debtor to pay said attorney's fees. The Debtor prays for such further and other relief, both general and special, as allowable under the circumstances.

THIS, the 12<sup>th</sup> day of March, 2013.

Respectfully submitted,

MARITIME COMMUNICATIONS/  
LAND MOBILE, LLC

By Its Attorneys,  
LAW OFFICES OF CRAIG M. GENO, PLLC

By   
Craig M. Geno

## OF COUNSEL:

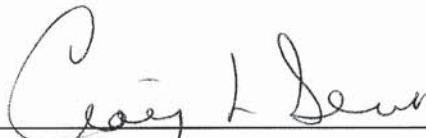
Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway (39157)  
P. O. Box 3380  
Ridgeland, MS 39158-3380  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
Application.wpd

**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.  
Office of the United States Trustee  
[Sammye.S.Tharp@usdoj.gov](mailto:Sammye.S.Tharp@usdoj.gov)

THIS, the 12<sup>th</sup> day of March, 2013.

  
\_\_\_\_\_  
Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:  
MARITIME COMMUNICATIONS/  
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**CHAPTER 11  
CASE NO. 11-13463-JDW**

**EXHIBIT "A"**

Law Offices of Robert J. Keller, P.C.  
 PO Box 33428, Washington DC 20033-0428  
 Tel: 202-656-8490 | Fax: 202-223-2121  
 Email: accounting@telcomlaw.com

Maritime Communications/Land Mobile, LLC  
 c/o Sandra M. DePriest  
 206 North 8th Street  
 Columbus, MS 39701

January 11, 2013

Matter No. 165-1  
 Hearing - EB Docket No. 11-71  
 Bill No. 1553

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Fees:		Hours	
11/21/12	WBK & discontinuance of operations legal arguments and briefing	0.7	245.00
11/21/12	ALJ Order (FCC 12M-53) after 11/20 Photocopies; reviewed, evaluated, and forwarded to client	0.3	105.00
11/21/12	reviewed/evaluated email submission by Havens to OGC re FOIA matter	0.4	140.00
11/23/12	reviewed/evaluated Havens further submission on FOIA matter	0.5	175.00
11/26/12	DCB & Watercom (WHG call signs) renewal applications; procedures, filing fees, strategy, etc.	1.2	420.00
11/26/12	MCLM response to Havens FOIA request re: redacted discovery submissions	0.8	280.00
11/26/12	SMDP & deposition arrangements/prep	0.4	140.00
11/26/12	drafted and sent email to Judge Sippel re FOIA matter	0.6	210.00



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January 11, 2013

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11/27/12	PK & DePriest deposition arrangements	0.2	70.00
11/27/12	updated incumbent license status listing for WBK and for proposed stipulations w/ EB	1.0	350.00
11/27/12	JR & DCB re Watercom renewals & A/L to Choctaw	0.3	105.00
11/27/12	Issue G inventory and stipulations & related communications w/ EB JR/DCB	2.2	770.00
11/28/12	Issue G stipulations negotiations w/ EB	1.4	490.00
11/28/12	Critical RF issues & JR/TS	0.3	105.00
11/28/12	FOIA matter and related telco w/ Matt Plache re Pinnacle language to ALJ; reviewed ALJ order (FCC 12M-54) re FOIA and OGC	0.7	245.00
11/28/12	TS review and signing of deposition	0.3	105.00
11/28/12	Watercom renewals and JR/DCB	0.2	70.00
11/29/12	legal research on permanent discontinuance issue	3.1	1,085.00
11/30/12	TS & deposition (review transcript, error correction sheet, signing) and discussion re possible designation of portions for confidentiality under Protective Order	0.7	245.00
12/03/12	PK & Glossary matter	0.2	70.00
12/04/12	Glossary matter - conf call w/ EB, James Chen & W Havens	0.9	315.00
12/04/12	Glossary matter - draft exchanges and negotiation w/ EB; draft matrix; related emails and phone calls w/ PK, DCB, JR, TS, etc.	1.5	525.00
12/04/12	Watercom renewals	0.2	70.00
12/05/12	FOIA matter & various email exchanges w/OGC & Havens; telcos w/ MP & JS re same	1.4	490.00

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12/05/12	Glossary matter - joint submission pleading and PK, WCH, etc.	1.4	490.00
12/05/12	Watercom renewals & JR/DCB	0.2	70.00
12/05/12	Bankruptcy matter - SkyTel motion to compel & CMG	0.3	105.00
12/06/12	Glossary submission & EB	1.2	420.00
12/06/12	Email memo to MO (WBK) re Issue G status of various incumbent sites & related hearing matters	1.0	350.00
12/06/12	Jeff Sheldon & PSE cancellation option	0.5	175.00
12/07/12	TS & deposition transcript	0.2	70.00
12/07/12	FOIA matter & WCH/OGC	0.4	140.00
12/10/12	reviewed/evaluated interrogatories served by EB (re Critical RF matters); fwd to client	0.7	245.00
12/13/12	EB's Critical RF interrogatories & JR/TS	1.4	490.00
12/14/12	MO (WBK) re Choctaw assignment application & related matters; related communications w/ DCB	0.8	280.00
12/14/12	ALJ order re Choctaw intervention	0.1	35.00
12/14/12	EB Critical RF interrogatories & TS	0.4	140.00
12/17/12	email memo to MO re pending deletion applications & incumbent station status	0.7	245.00
12/17/12	EB/PK & NCASS documents; EB interrogatories	0.5	175.00
12/17/12	TS & Choctaw recommendations	0.3	105.00
12/18/12	telco w/CMG re various BKY matters relative to FCC proceedings	0.5	175.00
12/19/12	Responses to EB interrogatories: drafted responses, telcos/email TS/JR;etc.	1.9	665.00

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12/19/12	MO (WBK) re draft of public interest statement (& Second Thursday justification) for assignment application	1.7	595.00
12/20/12	Response to EB 4th set of interrogatories & JS, TS (circulated & revised drafts; prepared tables and exhibits; etc.)	2.3	805.00
12/21/12	Response to EB 4th Interrogatories	0.5	175.00
12/24/12	final preparation and service of responses to EB 4th set of interrogatories (re Critical RF matters)	1.0	350.00
12/26/12	PK & discovery questions; follow-up w/ TS	0.2	70.00
12/27/12	PK & further questions re discovery and possible discrepancies in stipulations; revised Critical RF customer list & TS	0.3	105.00
01/02/13	Choctaw A/L matter & M.O., public interest statement	0.4	140.00
01/02/13	PK & discrepancies in stipulations	0.2	70.00
01/03/13	Supplemental answers to 4th interrogatories & TS	0.6	210.00
01/03/13	Comments on draft public interest statement & M.O.	0.8	280.00
01/03/13	telco/email w/ Dan Gillam (former tower lessor) re subpoena; related telcos/email w/ JR, TS & RM	0.8	280.00
01/03/13	Deposition arrangements/prep & SMDP/DRDP	0.4	140.00
01/03/13	Havens FOIA matter & OGC, DCB	0.4	140.00
01/04/13	Email correspondence w/PK re supplemental interrogatory responses, stipulations, etc.	0.5	175.00
01/04/13	Havens FOIA matter	0.4	140.00
01/04/13	Initial review of Havens application for	1.0	350.00



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	review in FOIA matter		
01/07/13	PK & deposition arrangements/prep	0.2	70.00
01/07/13	Choctaw/MCLM joint defense agreement & MO	0.4	140.00
01/07/13	PK & email correspondence re stipulations and interrogatory responses	0.5	175.00
01/08/13	SMDP & Choctaw JDA	0.2	70.00
01/09/13	BKY court order on Havens motion to compel & CG	0.3	105.00
01/09/13	Mark-up of Choctaw/MCLM JDA & MO	0.5	175.00
01/09/13	Deposition preparation & SMDP/DRDP and related telcos/email correspondence w/ SMDP, DRDP, CG, etc.	1.6	560.00
01/10/13	Deposition preparation	0.4	140.00
01/10/13	Choctaw JDA	0.3	105.00
01/11/13	Deposition preparation; incl. Protective Order declaration for Danny Ruhl	0.7	245.00
	Total fees:		\$17,010.00